

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

ABANTE ROOTER AND PLUMBING,
INC., individually and on behalf of all others
similarly situated,

Plaintiff,

vs.

SHORE FUNDING SOLUTIONS, INC.; and
DOES 1 through 10, inclusive,

Defendant.

Civil Case No.: 2:17-cv-06499-ADS-AKT

**NOTICE OF PLAINTIFF'S MOTION
FOR DEFAULT JUDGMENT**

PLEASE TAKE NOTICE that, at a time and date specified by this Court, the undersigned will move the Court for an Order, pursuant to Fed. R. Civ. Pr. 37 and 55(b)(2), granting Plaintiff's Motion for a Default Judgment against Defendant Shore Funding Solutions, Inc. In support of its motion, Plaintiff respectfully submits the annexed memorandum of Law, the Declaration of Ross H. Schmierer, Esq., and Affidavit of Abante Rooter and Plumbing, Inc. with relevant attachments.

Dated: New York, NY
July 27, 2018

Respectfully submitted,

s/ Ross H. Schmierer

Ross H. Schmierer, Esq. (RS-7215)
315 Madison Avenue, 3rd Floor
New York, NY 10017
Telephone: (646) 979-3642
Facsimile: (856) 797-9978

Law Offices of Todd M. Friedman, P.C.
21550 Oxnard St., Ste 780
Woodland Hills, CA 91367
Tel: 877-206-4741
tfriedman@attorneysforconsumers.com

Attorneys for Plaintiffs